

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA**

MELINDA and MARK LOE,  
*et al.*,

*Plaintiffs,*

v.

WILLIE JETT, *et al.*,

*Defendants.*

Civil No. 0:23-cv-01527-NEB-JFD

**DECLARATION OF  
UNIVERSITY OF  
NORTHWESTERN – ST. PAUL  
IN SUPPORT OF  
PLAINTIFFS’ MOTION  
FOR SUMMARY JUDGMENT**

I, Anita Cline-Cole, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am over the age of 18 and have personal knowledge or knowledge based on organizational documents of all contents of this declaration. These organizational documents were prepared as a regularly conducted business activity by University of Northwestern – St. Paul staff who have knowledge of the underlying information.

2. I currently serve as the Associate Vice President for Admissions at University of Northwestern – St. Paul (“Northwestern”). I have served in this role for 1.5 years. I previously served as the Director of Admissions for Northwestern for 5 years. I was designated as the Rule 30(b)(6) witness for Northwestern and testified in a deposition in this case in that capacity. I am duly authorized to offer this testimony on behalf of Northwestern.

3. Through my experience at Northwestern, I am familiar with Northwestern’s application and admissions process for undergraduate

students and for students applying for the Post-Secondary Enrollment Options (PSEO) program.

4. For the PSEO on-campus program, students submit an application for admission that includes the following information: the student's biographical information; the student's academic information, including high school transcripts, optional standardized test scores, and an academic reference; the student's current extracurricular activities and those they plan to participate in at Northwestern; a video essay.

5. To assess the student's spiritual fit with Northwestern's campus community, the on-campus application also includes a number of components addressing the student's Christian faith.

6. The application requests that the student provide a church reference and respond to an essay question asking the student to write "about the ways in which you have seen Jesus Christ work in and through your life; and how do you hope Northwestern and its community will impact your spiritual growth and development?"

7. The application asks the student to "affirm that I have read the Declaration of Christian Community" (DCC or Declaration). It also requests that the student affirm the following statement regarding the Declaration: "If I am accepted and subsequently enroll as a student, I will gladly adhere to its spirit and standards and will seek to be a positive, active member of the University of Northwestern community."

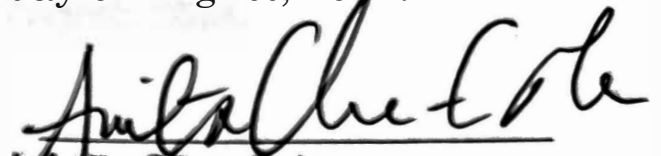
8. The application also asks the applicant the following two questions: 1) “Have you entrusted yourself to Jesus Christ as your Lord and Savior?”; 2) “Northwestern believes that the Bible alone is the final authority and standard in all matters of faith and personal conduct. Do you agree?”

9. Each on-campus application is considered by an enrollment counselor, who evaluates the student’s academic information and assesses whether the student will likely align with Northwestern’s Christian campus culture. If the counselor determines that the student may not be a good fit with the campus faith culture, additional admissions staff review the application, and ultimately the Director of Admissions determines whether to admit the student to the on-campus PSEO program.

10. Typically, if a student is denied admission to the on-campus program but meets Northwestern’s academic requirements, the student is admitted to the online PSEO program.

11. For purposes of this lawsuit, members of Northwestern’s admissions department reviewed admissions policies and decisions dating back to July 7, 2017. Based on the findings of that review, Northwestern has not denied any applicant admission to its undergraduate program or the PSEO program based on the student’s race, ethnicity, disability, gender, or sexual orientation.

Respectfully submitted this 30th day of August, 2024.

  
Arlita Cline-Cole